

## REMARKS

Claims 1, 7-12, and 21-24 are pending in this Application. Applicant has amended claims 1, 7, 10, and 12 to define the claimed invention more particularly, and cancelled claims 2-6 and 13-20 without prejudice or disclaimer. Applicant has added new claims 21-24 to claim additional features of the invention and provide varied protection for the invention. No new matter is added.

It is noted that the present claims correspond to the claims allowed in Japan in the counterpart foreign application.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicant specifically states that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claim 18 stands rejected under 35 U.S.C. §102(b) as being anticipated by Squibbs (US 2001/0015759).

Applicant has cancelled claim 18 without prejudice or disclaimer.

Claims 1-17, 19, and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Squibbs in view of Tanaka et al. (US Patent No. 6,888,565, hereinafter "Tanaka").

Applicant respectfully traverses this rejection in the following discussion.

### I. THE CLAIMED INVENTION

The claimed invention (e.g., as defined by exemplary claim 1) is directed to a display device.

The display device includes a display component, and a control component for controlling the display component so that a map including a photographing point of a subject is displayed, and so that information representing a photographing direction from the photographing point to the subject is displayed at a position on the map corresponding to the photographing point and, when information representing a photographing direction that has been displayed on the map is selected and designated, an image corresponding to the selected and designated information is displayed.

When image data of a subject that is desired by the user is not stored, the control

component controls the display component so that information representing a photographing direction to a subject that the user desires from a photographing point the user desires is displayed.

The photographing direction that the user desires and the photographing point the user desires are input by the user. The control component varies a display mode of the information representing the photographing direction between when image data of a subject is stored and when image data of a subject that the user desires has not been stored.

As such, clear advantages are provided by the invention as described in the present specification.

## II. THE PRIOR ART REJECTION

In rejecting claims 1-17, 19, and 20, the Examiner alleges that one of ordinary skill in the art would have combined Squibbs with Tanaka to render obvious the claimed invention.

Applicant respectfully submits that the references would not have been combined as alleged by the Examiner and that, even if combined, the alleged combination of references would not teach or suggest each and every feature of the claimed invention.

That is, Squibbs and Tanaka, either alone or in combination (arguendo) fail to teach or suggest, “*when information representing a photographing direction that has been displayed on the map is selected and designated, so that an image corresponding to the selected and designated information is displayed,*

*wherein when image data of a subject that is desired by the user is not stored, the control component controls the display component so that information representing a photographing direction to a subject that the user desires from a photographing point the user desires is displayed,*

*wherein the photographing direction that the user desires and the photographing point the user desires are input by the user, and*

*wherein the control component varies a display mode of the information representing the photographing direction between when image data of a subject is stored and when image data of a subject that the user desires has not been stored,”* as recited in claim 1, and similarly recited in claim 7.

Indeed, the Examiner does not even allege that the cited references teach or suggest

theses features of the claimed invention.

Furthermore, Applicant notes that Squibbs discloses storing point information of a desired-but-not-taken image in a camera (e.g., see column 12, lines 26-47), and presenting a detailed map 147 of the area around the point 148 (see column 13, lines 19-43; and Fig. 17) of the image that has not been photographed by the user.

Accordingly, even assuming (arguendo) that Squibbs discloses the photographing point of the image that has not been photographed, Squibbs does not disclose or suggest a photographing direction that has not been photographed, as recited in the independent claims of the present invention. Thus, Squibbs fails to satisfy the plain meaning of the final claim limitation.

Moreover, Applicant submits that Tanaka fails to make up the deficiencies of Squibbs.

Indeed, the Examiner does not even allege that Tanaka teaches or suggests these features of the claimed invention. The Examiner merely relies on Tanaka for allegedly teaching a control component.

Since Tanaka does not overcome the deficiencies of Tanaka, the combination of references fails to render the rejected claims obvious.

Moreover, Applicant respectfully submits that these references are unrelated and would not have been combined as alleged by the Examiner. Thus, no person of ordinary skill in the art would have considered combining these disparate references, absent impermissible hindsight.

Further, Applicant submits that there is no motivation or suggestion in the references (and thus no predictability for one of ordinary skill in the art) to urge the combination as alleged by the Examiner. Indeed, these references clearly do not teach or suggest their combination. Therefore, Applicant respectfully submits that one of ordinary skill in the art would not have combined the references as alleged by the Examiner. Therefore, the Examiner has failed to make a prima facie case of obviousness.

Therefore, Applicant respectfully submits that one with ordinary skill in the art would not have combined Squibbs with the teachings of Tanaka, and even if combined, the alleged combination does not teach or suggest (or render obvious) each and every feature of the claimed invention. Therefore, Applicant respectfully requests the Examiner to reconsider and

withdraw this rejection.

### III. NEW CLAIMS

New claims 21-24 have been added to claim additional features of the invention and to provide more varied protection for the claimed invention. The claims are independently patentable because of the novel features recited therein.

Applicant submits that new claims 21-24 are patentable at least because of similar reasons to those set forth above with respect to claims 1 and 7-12.

### IV. FORMAL MATTERS AND CONCLUSION

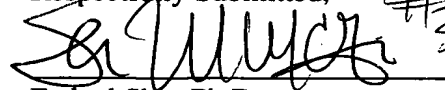
In view of the foregoing, Applicant submits that claims 1, 7-12, and 21-24, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

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Respectfully Submitted,



Farhad Shir, Ph.D.

Registration No. 59,403

#34,386

Sean M. McGinn, Esq.

Registration No. 34,386

**MCGINN INTELLECTUAL PROPERTY  
LAW GROUP, PLLC**

8321 Old Courthouse Road, Suite 200  
Vienna, Virginia 22182-3817  
(703) 761-4100  
Customer No. 21254